

UNITED STATES COURT OF FEDERAL CLAIMS

INSLAW, Inc., a Delaware Corporation,
and WILLIAM A. HAMILTON and
NANCY BURKE HAMILTON,

Plaintiffs,

vs.

UNITED STATES OF AMERICA,

Defendants.

Congressional Reference
No. 95-338X

Judge Miller

AFFIDAVIT OF CARL L. JACKSON

Personally appeared before me, an officer duly authorized to administer oaths,
CARL L. JACKSON, who deposes and says:

1.

My name is Carl L. Jackson. I reside in Alexandria, Virginia. I am an adult sui
juris and have direct personal knowledge of the facts recited in this affidavit.

2.

I am a former employee of the Drug Enforcement Administration ("DEA"). My
last assignment was Deputy Assistant Administrator of the DEA, Division for Planning
and Inspection, 1987-1989. My total years of service with DEA included 1961
through my retirement date of December 30, 1989.

3.

As a Deputy Assistant Administrator and Chief of the Dangerous Drug Section,
I attended and participated in meetings of DEA officials. In May 1984, I was

promoted to Special Agent in Charge ("SAC") of the Washington D.C. Field Office. At this position, I continued to be invited to senior level DEA meetings at DEA headquarters. During the 1983 to 1985 timeframe, D. Lowell Jensen came to DEA for meetings with DEA officials, many of which I attended. At one of these meetings which I attended, Mr. Jensen discussed DEA going to a new computer system in order to enhance reporting and tracking requirements. Mr. Jensen said that he hoped that the new system would be a "model for all federal law enforcement agencies" to utilize.

4.

I do not recall whether Mr. Jensen referred to the new system by any particular name. However, beginning in the 1983 to 1985 timeframe, DOJ started pushing the idea of using the same case tracking software system so that we all would be on-line with the same tracking system.

5.

Subsequent to this meeting involving Mr. Jensen, DEA received instructions from the Office of the Attorney General of the United States to implement a new case management software system in place of systems then being used by DEA. I learned this at another meeting I attended which took place, I believe, in the summer of 1988, if not before. This particular meeting was chaired by DEA Deputy Administrator Thomas Kelly. Also attending were Philip Camero, Deputy Assistant Administrator for the Office of Information Systems of the DEA, and other Deputy Assistant Administrators.

6.

This meeting was not a scheduled meeting. My secretary received a call from Mr. Kelly's office, who requested that I report to the conference room right away. As I recall, there was no agenda for this meeting and no minutes were kept of this meeting. It was impromptu and called due to the DOJ's directive for prompt action in implementing the new software and Mr. Kelly's concern for prompt delivery on this.

7.

Mr. Kelly informed us that he received a call from the Department of Justice, and that the Department was concerned that the agencies had not fully implemented the Justice Department's system and that all of Justice was not on-line at this time. He further said that the Attorney General had instructed the DEA and FBI to "chuck" their existing case tracking systems and replace them with the Justice Department's system. Mr. Kelly advised that Justice told him that DEA had "dropped the ball." Mr. Kelly also indicated that the case tracking system DOJ was currently using still had some flaws but DOJ was working them out so that everyone could get on line. Mr. Kelly then turned the meeting over to Mr. Camero.

8.

Mr. Camero, as noted, was the computer person and he had responsibilities in the information systems area of DEA. Mr. Camero is still employed at DEA to my knowledge. I did not understand many of the technical things Mr. Camero was talking about at this meeting. Mr. Camero described some of the problems with the present system but was interrupted by Mr. Kelly, who said that he didn't care what all the problems were, just to get it done.

9.

Mr. Camero continued and, in discussing the computer system, he referred to it as "PROMIS." Mr. Camero said that the PROMIS system was the one being used to try and accomplish what the Attorney General wanted with respect to getting everyone on line. Mr. Camero said that the FBI has got it too, and we are all going to use it and be on line. Mr. Camero also stated that PROMIS would solve the problem and that DOJ would work out the bugs.

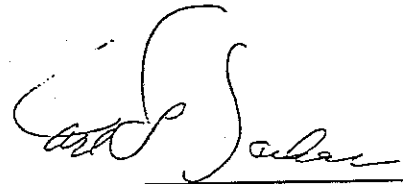
10.

I don't remember if the new case tracking system that was ultimately implemented at DEA was ever referred to as PROMIS. I do remember that we used a system called CAST. However, the system I began using at DEA after that meeting where PROMIS was mentioned, to the time I left DEA, was more enhanced and an improvement over the system I was using at DEA before that meeting.

11.

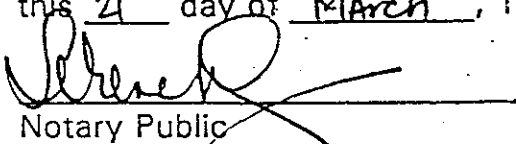
In or about the summer of 1990, I met with Bill and Nancy Hamilton. I told them much of the same information I have stated above.

FURTHER AFFIANT SAYETH NOT.



CARL L. JACKSON

Sworn to and subscribed before me,
this 21 day of March, 1996.


Notary Public

My Commission Expires 3/31/97